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FACIL:50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
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SUBJECT: Comments on NUREG-1003 DES re safety impacts of steam generator repair section on Emergency response planning should be added & person-rems annual dose corrected.

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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

OCT 27 1983

Mr. Steven A. Varga, Chief
Operating Reactor Branch, #1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

The National Center for Devices and Radiological Health staff has reviewed the Draft Environment Statement (DES) related to the steam generator repair at H. B. Robinson Steam Electric Plant, Unit No 2, NUREG-1003, September 1983. Our staff has evaluated the public health and safety impacts associated with steam generator repair and have the following comments to offer:

1. We agree with the NRC analysis that the major environmental impact is occupational exposure associated with the steam generator repair. It would be helpful in assessing the health aspects of the occupational exposure if the licensee's estimate of 2120 person-rem for the repair could show the dose to the 1500 workers by occupational category. Further, we believe the DES should point out that an increase of about 2120 person-rems projected for the year 1983 is a significant annual increase when compared with the annual collective occupational doses shown in Table 4.1, but is considered acceptable based on the average annual collective doses for the plant as discussed in Section 4.1.1.1. As noted in this section, it is essential that the licensee make a commitment to maintain the occupational doses within the 10 CFR 20 limit and as low as reasonably achievable (ALARA). The discussion in paragraph 4 of Section 4.1.1. on the average annual dose for 11 years of dose history at HBR-2 (1972 through 1983) should be clarified. As of this date, the steam generator repair is unlikely to commence before 1984. Thus, it should state for the purpose of showing the impact on the average annual dose, the 2120 person-rems was added to the 1982 annual collective occupational dose. With this addition, the average annual dose for the 11-year history would be 1107 person-rems. Section 4.1.1.1, paragraph 4, incorrectly shows the annual dose as 1075 person-rems. However, it is correctly shown as 1107 person-rems in Section 4.1.1.3, Summary.

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2. The public radiation exposure as presented in Section 4.1.2, covers all possible emission pathways, as depicted in Figure 4.1, that could impact on the population in the environs of the facility. The dose computational methodology used in the estimation of radiation doses to individuals and populations within 80 km. of the plant have provided the means to make reasonable estimates of the doses resulting from normal operations. The results of these computations based on radioactive releases resulting from steam generator repair indicate that the doses are well within the radiation protection standards of 10 CFR, Part 20. However, it would be helpful if a paragraph could be added to Section 4.1.2.1 (Doses from Effluents) that points out that the doses from the repair occur during the approximately 6 months refueling outage. Thus, the dose to individuals and populations will be the sum of the doses from normal operations and from steam generator repair. For instance, if the repair begins in January 1984, there would be 6 months of generator repair and 6 months of normal operations that would need to be summated to obtain the annual dose to compare with the radiation protection standards cited in this section.

3. The discusssion in Section 4.4. on the environmental impact of postulated accidents indicates that the accidents presented in the FES of April 1975 will be unchanged and remain valid for the repair. The FES considered accidents unique to the repair. We believe that this section provides adequate assessment of the dose and health impact of atmospheric release of radioactive materials.

4. There is no indication in the DES on emergency preparedness. We believe a section should be added on emergency response planning to mitigate the consequences of an accident which could impact on the offsite population. It should identify existing emergency plans and procedures that have been established to notify State and local authorities on accidents that are unique to steam generator repair.

Thank you for the opportunity to review and comment on this Draft Environmental Statement.

Sincerely yours,

John C. Villforth
Director
National Center for Devices
and Radiological Health